

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

---

In re:

DURA AUTOMOTIVE SYSTEMS, LLC, *et al.*,<sup>1</sup>

Debtors.

---

)  
) Chapter 11  
)  
) Case No. 19-12378 (KBO)  
)  
) (Jointly Administered)  
)

---

**NOTICE OF AGENDA OF MATTERS SCHEDULED FOR  
HEARING ON NOVEMBER 18, 2019 AT 11:00 A.M. (ET)<sup>2</sup>**

---

**I. MATTERS GOING FORWARD**

1. **Customer Programs Motion.** Debtors' Expedited Motion for Entry of Interim and Final Orders Authorizing the Debtors to Maintain and Administer Their Existing Customer Programs and Honor Certain Prepetition Obligations Related Thereto [Date Filed: 10/17/19; Docket No. 9].

Response Deadline: November 14, 2019 at 4:00 p.m. (ET), extended as to the Committee only until November 15, 2019 at 12:00 a.m. (ET).

Responses Received: Informal comments from the Official Committee of Unsecured Creditors (the "Committee").

Related Documents:

- A. Expedited Interim Order Authorizing the Debtors to Maintain and Administer Their Existing Customer Programs and Honor Certain Pre-Petition Obligations Related Thereto [Date Entered: 10/21/19; Docket No. 131].

---

<sup>1</sup> The debtor entities in these chapter 11 cases, along with the last four digits of each Debtor entity's federal tax identification number, are: Dura Automotive Systems Cable Operations, LLC (7052); Dura Automotive Systems, LLC (8111); Dura Fremont L.L.C. (1252); Dura G.P. (8092); Dura Mexico Holdings, LLC (4188); Dura Operating, LLC (2304); and NAMP, LLC (3693). Dura Automotive Systems, LLC's service address is: 1780 Pond Run, Auburn Hills, Michigan 48326.

<sup>2</sup> Please note that the hearing is before the Honorable Karen B. Owens in the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 6th Floor, Courtroom No. 2, Wilmington, Delaware 19801. Any person who wishes to appear telephonically must contact COURTCALL, LLC at 866-582-6878 no later than 12:00 p.m. (ET) one business day prior to the hearing. Chambers must be contacted regarding any late requests for telephonic appearances.

- B. Second Interim Order Authorizing the Debtors to Maintain and Administer Their Existing Customer Programs and Honor Certain Prepetition Obligations Related Thereto [Date Entered: 11/5/19; Docket No. 234].

Status: This matter is going forward with respect to a final order.

- 2. **Wages Motion.** Debtors' Expedited Motion for Entry of Interim and Final Orders Authorizing the Debtors to (I) Pay Prepetition Employee Wages, Salaries, Other Compensation, and Reimbursable Employee Expenses and (II) Continue Employee Benefits Programs [Date Filed: 10/17/19; Docket No. 10].

Response Deadline: November 14, 2019 at 4:00 p.m. (ET), extended as to the Committee only until November 15, 2019 at 12:00 a.m. (ET).

Responses Received: Informal comments from the Committee.

Related Documents:

- A. Expedited Interim Order Authorizing the Debtors to (I) Pay Prepetition Employee Wages, Salaries, Other Compensation, and Reimbursable Employee Expenses and (II) Continue Employee Benefits Programs [Date Entered: 10/21/19; Docket No. 126].
- B. Second Interim Order Authorizing the Debtors to (I) Pay Prepetition Employee Wages, Salaries, Other Compensation, and Reimbursable Employee Expenses and (II) Continue Employee Benefits Programs [Date Entered: 11/5/19; Docket No. 232].

Status: This matter is going forward with respect to a final order.

- 3. **Critical Vendors Motion.** Debtors' Expedited Motion for Entry of Interim and Final Orders Authorizing Payment of Prepetition Claims of Certain Critical Vendors, Foreign Vendors, 503(b)(9) Claimants, Lien Claimants and Shippers [Date Filed: 10/17/19; Docket No. 11].

Response Deadline: November 14, 2019 at 4:00 p.m. (ET), extended as to the Committee only until November 15, 2019 at 12:00 a.m. (ET).

Responses Received: Informal comments from the Committee.

Related Documents:

- A. Expedited Interim Order Authorizing Payments of Prepetition Claims of Certain Critical Vendors, Foreign Vendors, 503(b)(9) Claimants, Lien Claimants and Shippers [Date Entered: 10/21/19; Docket No. 132].

- B. Second Interim Order Authorizing Payments of Prepetition Claims of Certain Critical Vendors, Foreign Vendors, 503(b)(9) Claimants, Lien Claimants and Shippers [Date Entered: 11/5/19; Docket No. 236].

Status: This matter is going forward with respect to a final order.

- 4. **Cash Management Motion.** Debtors' Expedited Motion for Entry of Interim and Final Orders Authorizing the Debtors to (I) Continue to Operate Their Cash Management Systems, (II) Honor Certain Prepetition Obligations Related Thereto, (III) Maintain Existing Business Forms, and (IV) Continue to Perform Intercompany Transactions [Date Filed: 10/17/19; Docket No. 14].

Response Deadline: November 14, 2019 at 4:00 p.m. (ET), extended as to the Committee only until November 15, 2019 at 12:00 a.m. (ET).

Responses Received: Informal comments from the U.S. Trustee and the Committee.

Related Documents:

- A. Expedited Interim Order Authorizing the Debtors to (I) Continue to Operate Their Cash Management Systems, (II) Honor Certain Prepetition Obligations Related Thereto, (III) Maintain Existing Business Forms, and (IV) Continue to Perform Intercompany Transactions [Date Entered: 10/18/19; Docket No. 84].
- B. Second Interim Order Authorizing the Debtors to (I) Continue to Operate Their Cash Management Systems, (II) Honor Certain Prepetition Obligations Related Thereto, (III) Maintain Existing Business Forms, and (IV) Continue to Perform Intercompany Transactions [Date Entered: 11/5/19; Docket No. 235].

Status: This matter is going forward with respect to a final order.

- 5. **DIP Motion.** Debtors' Expedited Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Financing, (II) Authorizing the Debtors to Use Cash Collateral, (III) Granting Liens and Providing Superpriority Administrative Expense Status, (IV) Granting Adequate Protection to the Prepetition Lenders, and (V) Modifying the Automatic Stay [Date Filed: 10/17/19; Docket No. 19].

Response Deadline: November 14, 2019 at 4:00 p.m. (ET), extended as to the Committee only until November 15, 2019 at 12:00 a.m. (ET).

Responses Received: Informal comments from the U.S. Trustee and the Committee.

Related Documents:

- A. Expedited Interim Order (I) Authorizing the Debtors to Obtain Postpetition Financing, (II) Authorizing the Debtors to Use Cash Collateral, (III) Granting Liens and Providing Superpriority Administrative Expense Status, (IV) Granting Adequate Protection to the Prepetition Lenders, and (V) Modifying the Automatic Stay [Date Entered: 10/18/19; Docket No. 86].
- B. Order Regarding Call-In Procedures for Hearing on Post-Petition Financing Set for October 23, 2019 [Date Entered: 10/21/2019; Docket No. 134].
- C. DIP Lenders' Statement in Support of Debtors Expedited DIP Motion [Date Filed: 10/23/19; Docket No. 156].
- D. Second Interim Order (I) Authorizing the Debtors to Obtain Postpetition Financing, (II) Authorizing the Debtors to Use Cash Collateral, (III) Granting Liens and Providing Superpriority Administrative Expense Status, (IV) Granting Adequate Protection to the Prepetition Lenders, and (V) Modifying the Automatic Stay [Date Entered: 11/1/19; Docket No. 211].
- E. Order Setting Hearing Regarding Postpetition Financing and Use of Cash Collateral [Date Entered: 11/1/19; Docket No. 212].

Status: This matter is going forward with respect to a final order.

6. **Utilities Motion.** Debtors' Motion for Entry an Orders (I) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Utility Services, (II) Determining Adequate Assurance of Payment for Future Utility Services, and (III) Establishing Procedures for Resolving Requests for Additional Adequate Assurance of Payment [Date Filed: 10/17/19; Docket No. 23].

Response Deadline: November 7, 2019 at 4:00 p.m. (ET), extended as to Constellation NewEnergy, Inc. and Constellation NewEnergy – Gas Division, LLC to November 11, 2019 at 4:00 p.m. (ET), extended as to the Committee only until November 15, 2019 at 12:00 a.m. (ET).

Responses Received:

- A. Objection of Constellation NewEnergy, Inc. and Constellation NewEnergy – Gas Division, LLC to the Debtors’ Motion of an Order (I) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Utility Services, (II) Determining Adequate Assurance of Payment for Future Utility Services, and (III) Establishing Procedures for Resolving Requests for Additional Adequate Assurance of Payment [Date Filed: 11/8/2019; Docket No. 270].

Related Documents: None.

Status: This matter is going forward.

- 7. **Bidding Procedures Motion.** Debtors’ Motion for Entry of an Order (I) Approving the Debtors to Perform Obligations Related to the Stalking Horse Bid, (II) Approving Bidding Procedures with Respect to Substantially All Assets, (III) Approving Contract Assumption and Assignment Procedures, (IV) Scheduling Bid Deadlines, an Auction, and the Hearings and Objection Deadlines Related Thereto, and (V) Approving the Form and Manner of Notice Thereof [Date Filed: 10/23/19; Docket No. 154].

Response Deadline: November 14, 2019 at 4:00 p.m. (ET), extended as to the Committee only until November 15, 2019 at 12:00 a.m. (ET).

Responses Received: Informal comments from the U.S. Trustee and the Committee.

Related Documents:

- A. Notice of Debtors’ Motion for Approval of Bidding Procedures [Date Filed: 11/8/19; Docket No. 273].
- B. Declaration of Richard W. Morgner in Support of the Debtors’ Bidding Procedures Motion [Date Filed: 11/14/19; Docket No. 304].

Status: This matter is going forward.

*[Remainder of page intentionally left blank.]*

Dated: November 14, 2019  
Wilmington, Delaware

**BAYARD, P.A.**

/s/ Justin R. Alberto

Justin R. Alberto (No. 5126)  
Erin R. Fay (No. 5268)  
Daniel N. Brogan (No. 5723)  
600 N. King Street, Suite 400  
Wilmington, Delaware 19801  
Telephone: (302) 655-5000  
Facsimile: (302) 658-6395  
E-mail: jalberto@bayard.com  
efay@bayardlaw.com  
dbrogan@bayardlaw.com

- and -

James H.M. Sprayregen, P.C.  
Ryan Blaine Bennett, P.C. (admitted *pro hac vice*)  
Gregory F. Pesce (admitted *pro hac vice*)

**KIRKLAND & ELLIS LLP**

**KIRKLAND & ELLIS INTERNATIONAL LLP**

300 North LaSalle Street  
Chicago, Illinois 60654  
Telephone: (312) 862-2000  
Facsimile: (312) 862-2200  
Email: jsprayregen@kirkland.com  
rbennett@kirkland.com  
gregory.pesce@kirkland.com

- and -

Christopher Marcus, P.C. (admitted *pro hac vice*)

**KIRKLAND & ELLIS LLP**

**KIRKLAND & ELLIS INTERNATIONAL LLP**

601 Lexington Avenue  
New York, New York 10022  
Telephone: (212) 446-4800  
Facsimile: (212) 446-4900  
Email: cmarcus@kirkland.com

*Proposed Co-Counsel to the Debtors and Debtors in Possession*